

Thomas-Jensen

Affirmation

Exhibit # 102

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

C.A. No. 1:25-cv-00039-JJM-PAS

DONALD TRUMP, in his official capacity as President of the United States; et al.,

Defendants.

DECLARATION OF KENNETH SANCHAGRIN

I, Kenneth Sanchagrin, declare as follows:

1. I am a resident of the State of Oregon. I am over the age of 18 and I make this declaration based on my personal knowledge of the matters set forth below, including based on my review of information and business records provided by my staff. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am the Executive Director of the Oregon Criminal Justice Commission (CJC). I have held that position since December 2020 and have been with CJC for seven years.

3. In this role, I oversee the day-to-day functioning of the agency and directly supervise its three division managers who oversee the Programs Division, Research Division, and Operations Division. Included in the oversight of the Operations Division is the management and disbursement of CJC's federal grant portfolio.

4. CJC administers multiple public safety grant programs intended for local, state, and tribal governments and community-based organizations working on criminal justice initiatives. CJC administers eight federal grants from the United States Department of Justice

(USDOJ), including Byrne State Crisis Intervention Program (SCIP); Edward Byrne Memorial Justice Assistance Grant (JAG); Project Safe Neighborhoods (PSN); Residential Substance Abuse Treatment for State Prisoners (RSAT); Prison Rape Elimination Act (PREA); State Justice Statistics Program for Statistical Analysis Centers (SAC); Justice Counts Implementation Program (JRIX) and Sex Offender Registration and Notification Act (SORNA).

5. CJC administers approximately \$18,914,732 in total federal grant funds awarded between 2021-2024. Of that total, approximately \$16,017,060 in federally committed funds remains outstanding, including:

- a. \$7,862,203 in JAG Grant funds (of \$8,997,011 currently awarded).
- b. \$445,550 in JRIX Grant funds (of \$662,769 currently awarded).
- c. \$77,970 in PREA Grant funds (of \$506,076 currently awarded).
- d. \$531,526 in PSN Grant funds (of \$606,068 currently awarded).
- e. \$1,845,324 in RSAT Grant funds (of \$1,845,324 currently awarded).
- f. \$204,459 in BJS-awarded SAC Grant funds (of \$850,762 currently awarded).
- g. \$4,857,528 in SCIP Grant funds (of \$4,925,723 currently awarded).
- h. \$192,500 in SORNA Grant funds (of \$518,999 currently awarded).

6. These federal grant funds support a wide variety of criminal justice programs and initiatives, including funding for state and local law enforcement agencies, improvement of safety in state prisons and local jails, election security, reduction of gang and gun violence, education for adults in custody, community crisis intervention programs, deterrence of urban street racing, prison and jail residential addiction treatment programs, legal assistance for tribal communities, increased Specialty Court capacity, and funding designed to increase the pace of criminal prosecutions and the reduction of case backlogs.

7. CJC's grant plans for this year have relied on the above-described USDOJ grants, and our grant subrecipients have made plans and allocated funding for staffing and program administration based on the anticipated receive of federal funding promised.

8. The OMB Directive on Monday January 27, 2025 stating that all federal grants would be frozen caused chaos and confusion among CJC staff and our grant subrecipients regarding whether our programs would continue to receive funding for agreements that were already in place with the federal government. CJC staff reached out to our federal grant manager at the Bureau of Justice Assistance (within USDOJ) but received no response.

9. If federal funds to the CJC are allowed to remain frozen, or if the federal funding is again paused, blocked, denied, or delayed, criminal justice programs that depend on this funding will likely be brought to a halt. CJC distributes federal grant funds on a quarterly basis and depending on the timing, a disruption to our federal funding could result in our subrecipients facing cash shortfalls, not being able to pay their employees, and being forced to interrupt program services.

10. Important public safety services would be interrupted if the promised federal funding is withheld and the programs they fund cease to function, with downstream subrecipient impacts including: decreased County District Attorney Office and Specialty Court capacity, decreased recidivism reduction efforts, and reduced law enforcement activity (should JAG funding be withheld); decreased ability of the State of Oregon and local entities to offer Residential Substance Abuse Treatment services (should RSAT funding be withheld); decreased ability of the State to comply with federal SORNA or PREA standards, invest in prison community safety measures, and weaken sexual offender registration enforcement (should SORNA or PREA funding be withheld); decreased support for youth gang violence reduction programs (should PSN funding be withheld); decreased support for community violence programs (should SCIP funding be withheld); and compromised ability of the State and Federal

government to make data-informed criminal justice decisions (should JRIX funding be withheld).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 4, 2025, at Silverton, Oregon.



KENNETH SANCHAGRIN